

AD HOC TELECOMMUNICATIONS USERS COMMITTEE

ACCESS REFORM PRINCIPLES

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

- The current access charge rules are not economically rational, and produce excessive rates.
- The Interconnection Order is a good starting point for access charge reform.
 - Access charge rate structure should replicate Unbundled Network Elements, rather than the current BSA rate structure.
 - Access charges should be based on forward-looking costs, i.e. TELRIC.
 - Access charges should not include implicit subsidies.

AD HOC TELECOMMUNICATIONS USERS COMMITTEE

ACCESS CHARGE REFORM PRINCIPLES

- CCLC has no place in, and is not needed in, a TELRIC-based access charge model.
- The forward-looking costs of subscriber lines in states with 82% of all access lines is less than or equal to the maximum SLC levels.
 - Subscriber line TELRIC based on FCC proxy costs for loops and ports.
 - CCLC is not needed to cover the forward looking costs of subscriber lines.
 - CCLC should not be used to implicitly subsidize Universal Service.
- The forward-looking cost of primary lines is less than the forward-looking cost of second lines, because primary lines permit substantially higher utilization of outside plant. About 17% of homes subscribe to second lines.

**TOTAL SLC Revenues Collected Today Are Sufficient to Cover a
TELRIC-Based Interstate NTS Assignment without CCLCs**

| | |
|--|-----------------------|
| <i>Approximate Annual SLC Revenues Today</i> | <i>\$7.05 Billion</i> |
|--|-----------------------|

Approximate Annual TELRIC-Default
Interstate NTS Assignment

| | |
|-------------------------------|----------------|
| Loop Only | \$6.18 Billion |
| Loop and Port (low estimate) | \$6.66 Billion |
| Loop and Port (high estimate) | \$7.05 Billion |

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| Loop Only | \$6.18 Billion |
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| Loop and Port (high estimate) | \$7.05 Billion |

Res and Bus Access Lines

| | |
|-------|-------------|
| Total | 145-million |
|-------|-------------|

| | |
|--|-------------|
| In States where Existing SLC revenues recover TELRIC-BASED NTS Assignment | 109-million |
|--|-------------|

| | |
|--|-------------|
| In States where SLC revenues would recover TELRIC-BASED NTS Assignment if raised to CAP | 119-million |
|--|-------------|

| | |
|---|-----|
| Percentage of lines for which no additional NTS recovery is required | 82% |
|---|-----|

TELRIC-BASED NTS

State Proxy Rate:

Interstate Assignment (25%

| State | Carrier | Local Loop Proxy Ceiling | Low Range High Range (Port Proxy= (Port Proxy= \$1.10) \$2.00) | | Loop Only | Loop & Port Low | Loop & Port High |
|-------------------|---------|-----------------------------|--|---------|--------------|-----------------------|------------------------|
| | | | | | | | |
| Alabama | BSOU | \$17.25 | \$18.35 | \$19.25 | \$4.31 | \$4.58 | \$4.80 |
| Arizona | USWS | \$12.85 | \$13.95 | \$14.85 | \$3.21 | \$3.47 | \$3.70 |
| Arkansas | SWBT | \$21.18 | \$22.28 | \$23.18 | \$5.30 | \$5.52 | \$5.74 |
| California | PACB | \$11.10 | \$12.20 | \$13.10 | \$2.78 | \$2.66 | \$2.86 |
| Colorado | USWS | \$14.97 | \$16.07 | \$16.97 | \$3.74 | \$3.99 | \$4.21 |
| Connecticut | SNET | \$13.23 | \$14.33 | \$15.23 | \$3.31 | \$3.47 | \$3.69 |
| Delaware | BLAT | \$13.24 | \$14.34 | \$15.24 | \$3.31 | \$3.59 | \$3.81 |
| District of Colum | BLAT | \$10.81 | \$11.91 | \$12.81 | \$2.70 | \$2.94 | \$3.16 |
| Florida | BSOU | \$13.68 | \$14.78 | \$15.68 | \$3.42 | \$3.65 | \$3.87 |
| Georgia | BSOU | \$16.09 | \$17.19 | \$18.09 | \$4.02 | \$4.21 | \$4.43 |
| Idaho | USWS | \$20.16 | \$21.26 | \$22.16 | \$5.04 | \$5.25 | \$5.48 |
| Illinois | AMER | \$13.12 | \$14.22 | \$15.12 | \$3.28 | \$3.56 | \$3.78 |
| Indiana | AMER | \$13.29 | \$14.39 | \$15.29 | \$3.32 | \$3.60 | \$3.82 |
| Iowa | USWS | \$15.94 | \$17.04 | \$17.94 | \$3.99 | \$4.26 | \$4.49 |
| Kansas | SWBT | \$19.85 | \$20.95 | \$21.85 | \$4.96 | \$5.24 | \$5.46 |
| Kentucky | BSOU | \$16.70 | \$17.80 | \$18.70 | \$4.18 | \$4.45 | \$4.68 |
| Louisiana | BSOU | \$16.98 | \$18.08 | \$18.98 | \$4.25 | \$4.52 | \$4.75 |
| Maine | NYNX | \$18.69 | \$19.79 | \$20.69 | \$4.67 | \$4.56 | \$4.76 |
| Maryland | BLAT | \$13.36 | \$14.46 | \$15.36 | \$3.34 | \$3.61 | \$3.83 |
| Massachusetts | NYNX | \$9.83 | \$10.93 | \$11.83 | \$2.46 | \$2.62 | \$2.84 |
| Michigan | AMER | \$15.27 | \$16.37 | \$17.27 | \$3.82 | \$3.99 | \$4.21 |
| Minnesota | USWS | \$14.81 | \$15.91 | \$16.81 | \$3.70 | \$3.91 | \$4.13 |
| Mississippi | SWBT | \$21.97 | \$23.07 | \$23.97 | \$5.49 | \$5.72 | \$5.94 |
| Missouri | BSOU | \$18.32 | \$19.42 | \$20.32 | \$4.58 | \$4.83 | \$5.06 |
| Montana | USWS | \$25.18 | \$26.28 | \$27.18 | \$6.30 | \$6.47 | \$6.69 |
| Nebraska | USWS | \$18.05 | \$19.15 | \$20.05 | \$4.51 | \$4.79 | \$5.01 |
| Nevada | NEVB | \$18.95 | \$20.05 | \$20.95 | \$4.74 | \$4.97 | \$5.19 |
| Hew Hampshire | NYNX | \$16.00 | \$17.10 | \$18.00 | \$4.00 | \$4.28 | \$4.50 |
| New Jersey | BLAT | \$12.47 | \$13.57 | \$14.47 | \$3.12 | \$3.39 | \$3.62 |
| New Mexico | USWS | \$18.66 | \$19.76 | \$20.66 | \$4.67 | \$4.75 | \$4.97 |
| New York | NYNX | \$11.75 | \$12.85 | \$13.75 | \$2.94 | \$3.02 | \$3.23 |
| North Carolina | BSOU | \$16.71 | \$17.81 | \$18.71 | \$4.18 | \$4.43 | \$4.65 |
| North Dakota | USWS | \$25.36 | \$26.46 | \$27.36 | \$6.34 | \$6.42 | \$6.64 |
| Ohio | AMER | \$15.73 | \$16.83 | \$17.73 | \$3.93 | \$4.18 | \$4.40 |
| Oklahoma | SWBT | \$17.63 | \$18.73 | \$19.63 | \$4.41 | \$4.68 | \$4.91 |
| Oregon | USWS | \$15.44 | \$16.54 | \$17.44 | \$3.86 | \$4.05 | \$4.27 |

TELRIC-BASED NTS

State Proxy Rate: Interstate Assignment (25%

| State | Carrier | Local Loop Proxy Ceiling | Low Range High Range (Port Proxy= (Port Proxy= | | Loop Only | Loop & Port Low | Loop & Port High |
|-------------------|---------|-----------------------------|---|---------|--------------|-----------------------|------------------------|
| | | | \$1.10) | \$2.00) | | | |
| Pennsylvania | BLAT | \$12.30 | \$13.40 | \$14.30 | \$3.08 | \$3.35 | \$3.58 |
| Rhode Island | NYNX | \$11.48 | \$12.58 | \$13.48 | \$2.87 | \$2.94 | \$3.15 |
| South Carolina | BSOU | \$17.07 | \$18.17 | \$19.07 | \$4.27 | \$4.51 | \$4.73 |
| South Dakota | USWS | \$25.33 | \$26.43 | \$27.33 | \$6.33 | \$6.53 | \$6.75 |
| Tennessee | BSOU | \$17.41 | \$18.51 | \$19.41 | \$4.35 | \$4.59 | \$4.82 |
| Texas | SWBT | \$15.49 | \$16.59 | \$17.49 | \$3.87 | \$4.08 | \$4.30 |
| Utah | USWS | \$15.12 | \$16.22 | \$17.12 | \$3.78 | \$3.95 | \$4.17 |
| Vermont | NYNX | \$20.13 | \$21.23 | \$22.13 | \$5.03 | \$1.71 | \$1.78 |
| Virginia | BLAT | \$14.13 | \$15.23 | \$16.13 | \$3.53 | \$4.84 | \$5.12 |
| Washington | USWS | \$13.37 | \$14.47 | \$15.37 | \$3.34 | \$3.52 | \$3.74 |
| West Virginia | BLAT | \$19.25 | \$20.35 | \$21.25 | \$4.81 | \$5.06 | \$5.29 |
| Wisconsin | AMER | \$15.94 | \$17.04 | \$17.94 | \$3.99 | \$4.24 | \$4.46 |
| Wyoming | USWS | \$25.11 | \$26.21 | \$27.11 | \$6.28 | \$6.53 | \$6.75 |
| Weighted Average: | | | | | \$3.55 | \$3.71 | \$3.92 |

Billable Business and Residence Exchange Access Lines - Year End 1995

| <u>State</u> | <u>Carrier</u> | <u>Business Access Lines:</u> | | <u>Residential</u> |
|----------------------|----------------|-------------------------------|-------------------|--|
| | | <u>Single Line</u> | <u>Multi Line</u> | <u>Access</u> <u>Lines:</u> <u>Total</u> |
| Alabama | BSOU | 58,279 | 438,635 | 1,475,979 |
| Arizona | USWS | 42,803 | 566,272 | 1,629,107 |
| Arkansas | SWBT | 29,621 | 211,953 | 675,162 |
| California | PACB | 533,245 | 6,313,104 | 12,462,105 |
| Colorado | USWS | 55,981 | 631,929 | 1,529,094 |
| Connecticut | SNET | 69,630 | 482,190 | 1,414,948 |
| Delaware | BLAT | 13,276 | 147,007 | 313,077 |
| District of Columbia | BLAT | 7,554 | 553,584 | 286,425 |
| Florida | BSOU | 241,998 | 2,303,270 | 6,602,113 |
| Georgia | BSOU | 119,666 | 1,103,478 | 2,484,561 |
| Idaho | USWS | 20,193 | 126,995 | 410,878 |
| Illinois | AMER | 320,847 | 2,187,940 | 4,551,730 |
| Indiana | AMER | 86,896 | 775,247 | 2,124,167 |
| Iowa | USWS | 41,412 | 263,998 | 944,159 |
| Kansas | SWBT | 32,982 | 310,113 | 832,115 |
| Kentucky | BSOU | 52,326 | 321,765 | 1,617,575 |
| Louisiana | BSOU | 53,145 | 492,414 | 1,508,895 |
| Maine | NYNX | 28,376 | 123,132 | 450,947 |
| Maryland | BLAT | 66,361 | 1,001,726 | 2,091,428 |
| Massachusetts | NYNX | 201,521 | 1,067,209 | 2,706,501 |
| Michigan | AMER | 244,790 | 1,465,973 | 3,746,014 |
| Minnesota | USWS | 41,364 | 609,255 | 1,401,465 |
| Mississippi | BSOU | 43,653 | 242,272 | 840,082 |
| Missouri | SWBT | 82,301 | 692,786 | 2,043,374 |
| Montana | USWS | 12,797 | 70,297 | 239,070 |
| Nebraska | USWS | 26,290 | 198,348 | 574,886 |
| Nevada | NEVB | 76,930 | 243,167 | 653,089 |
| New Hampshire | NYNX | 31,504 | 157,209 | 484,126 |
| New Jersey | BLAT | 134,440 | 1,656,971 | 3,716,285 |
| New Mexico | USWS | 23,065 | 179,311 | 585,471 |
| New York | NYNX | 339,912 | 3,227,097 | 7,466,909 |
| North Carolina | BSOU | 184,845 | 832,665 | 2,532,516 |
| North Dakota | USWS | 9,133 | 57,511 | 185,548 |
| Ohio | AMER | 245,022 | 1,416,905 | 4,319,855 |
| Oklahoma | SWBT | 47,242 | 363,721 | 1,103,926 |
| Oregon | USWS | 53,394 | 412,794 | 1,178,177 |
| Pennsylvania | BLAT | 256,463 | 1,845,512 | 4,856,217 |

Billable Business and Residence Exchange Access Lines - Year End 1995

| <u>State</u> | <u>Carrier</u> | <u>Business Access Lines:</u> | | <u>Residential Access Lines: Total</u> |
|-------------------------|----------------|-------------------------------|-------------------|--|
| | | <u>Single Line</u> | <u>Multi Line</u> | |
| Rhode Island | NYNX | 33,964 | 123,323 | 426,973 |
| South Carolina | BSOU | 48,070 | 348,129 | 1,039,978 |
| South Dakota | USWS | 13,058 | 70,671 | 212,983 |
| Tennessee | BSOU | 74,621 | 626,648 | 1,900,401 |
| Texas | SWBT | 228,625 | 2,755,837 | 6,669,223 |
| Utah | USWS | 21,262 | 247,552 | 645,102 |
| Vermont | NYNX | 16,327 | 68,650 | 216,776 |
| Virginia | BLAT | 103,849 | 1,161,158 | 2,544,748 |
| Washington | USWS | 79,867 | 716,699 | 2,120,319 |
| West Virginia | BLAT | 22,766 | 143,777 | 564,877 |
| Wisconsin | AMER | 68,023 | 652,311 | 1,691,689 |
| Wyoming | USWS | 8,769 | 57,575 | 151,470 |
| Weighted Average | | 4,648,458 | 40,066,085 | 100,222,515 |

Analysis of Subscriber Line Charge Recovery of Forward Looking NTS Costs

| <u>State</u> | <u>Carrier</u> | <u>Residence SLC</u> | <u>Business Multiline SLC</u> | <u>Weighted Average SLC Per Line</u> | <u>TELRIC-Default Interstate NTS Assignment Per Line</u> | <u>Does Existing SLC Recover Full NTS?</u> |
|----------------------|----------------|--------------------------|---------------------------------------|--|--|--|
| Alabama | BSOU | \$3.50 | \$6.00 | \$4.06 | \$4.58 | |
| Arizona | USWS | \$3.50 | \$6.00 | \$4.13 | \$3.47 | Yes |
| Arkansas | SWBT | \$3.50 | \$6.00 | \$4.08 | \$5.52 | |
| California | PACB | \$3.50 | \$4.73 | \$3.90 | \$2.66 | Yes |
| Colorado | USWS | \$3.50 | \$6.00 | \$4.21 | \$3.99 | Yes |
| Connecticut | SNET | \$3.50 | \$5.99 | \$4.11 | \$3.47 | Yes |
| Delaware | BLAT | \$3.50 | \$2.95 | \$3.33 | \$3.59 | |
| District of Columbia | BLAT | \$3.50 | \$5.91 | \$5.07 | \$2.94 | Yes |
| Florida | BSOU | \$3.50 | \$6.00 | \$4.13 | \$3.65 | Yes |
| Georgia | BSOU | \$3.50 | \$6.00 | \$4.24 | \$4.21 | Yes |
| Idaho | USWS | \$3.50 | \$6.00 | \$4.07 | \$5.25 | |
| Illinois | AMER | \$3.50 | \$4.01 | \$3.66 | \$3.56 | Yes |
| Indiana | AMER | \$3.50 | \$5.58 | \$4.04 | \$3.60 | Yes |
| Iowa | USWS | \$3.50 | \$4.67 | \$3.75 | \$4.26 | |
| Kansas | SWBT | \$3.50 | \$6.00 | \$4.16 | \$5.24 | |
| Kentucky | BSOU | \$3.50 | \$6.00 | \$3.90 | \$4.45 | |
| Louisiana | BSOU | \$3.50 | \$6.00 | \$4.10 | \$4.52 | |
| Maine | NYNX | \$3.50 | \$6.00 | \$4.01 | \$4.56 | |
| Maryland | BLAT | \$3.50 | \$5.72 | \$4.20 | \$3.61 | Yes |
| Massachusetts | NYNX | \$3.50 | \$6.00 | \$4.17 | \$2.62 | Yes |
| Michigan | AMER | \$3.50 | \$5.28 | \$3.98 | \$3.99 | |
| Minnesota | USWS | \$3.50 | \$5.26 | \$4.02 | \$3.91 | Yes |
| Mississippi | BSOU | \$3.50 | \$6.00 | \$4.04 | \$5.72 | |
| Missouri | SWBT | \$3.50 | \$6.00 | \$4.11 | \$4.83 | |
| Montana | USWS | \$3.50 | \$6.00 | \$4.05 | \$6.47 | |
| Nebraska | USWS | \$3.50 | \$6.00 | \$4.12 | \$4.79 | |
| Nevada | NEVB | \$3.50 | \$5.22 | \$3.93 | \$4.97 | |
| New Hampshire | NYNX | \$3.50 | \$6.00 | \$4.08 | \$4.28 | |
| New Jersey | BLAT | \$3.50 | \$5.02 | \$3.96 | \$3.39 | Yes |
| New Mexico | USWS | \$3.50 | \$6.00 | \$4.07 | \$4.75 | |
| New York | NYNX | \$3.50 | \$6.00 | \$4.23 | \$3.02 | Yes |
| North Carolina | BSOU | \$3.50 | \$6.00 | \$4.09 | \$4.43 | |
| North Dakota | USWS | \$3.50 | \$6.00 | \$4.07 | \$6.42 | |
| Ohio | AMER | \$3.50 | \$5.32 | \$3.93 | \$4.18 | |
| Oklahoma | SWBT | \$3.50 | \$6.00 | \$4.10 | \$4.68 | |
| Oregon | USWS | \$3.50 | \$6.00 | \$4.13 | \$4.05 | Yes |
| Pennsylvania | BLAT | \$3.50 | \$5.60 | \$4.06 | \$3.35 | Yes |
| Rhode Island | NYNX | \$3.50 | \$6.00 | \$4.03 | \$2.94 | Yes |

Analysis of Subscriber Line Charge Recovery of Forward Looking NTS Costs

| <u>State</u> | <u>Carrier</u> | <u>Residence SLC</u> | <u>Business Multiline SLC</u> | <u>Weighted Average SLC Per Line</u> | <u>TELRIC-Default Interstate NTS Assignment Per Line</u> | <u>Does Existing SLC Recover Full NTS?</u> |
|-------------------------|----------------|--------------------------|---------------------------------------|--|--|--|
| South Carolina | BSOU | \$3.50 | \$6.00 | \$4.11 | \$4.51 | |
| South Dakota | USWS | \$3.50 | \$5.14 | \$3.89 | \$6.53 | |
| Tennessee | BSOU | \$3.50 | \$6.00 | \$4.10 | \$4.59 | |
| Texas | SWBT | \$3.50 | \$6.00 | \$4.21 | \$4.08 | Yes |
| Utah | USWS | \$3.50 | \$6.00 | \$4.18 | \$3.95 | Yes |
| Vermont | NYNX | \$3.50 | \$6.00 | \$4.07 | \$1.71 | Yes |
| Virginia | BLAT | \$3.50 | \$5.92 | \$4.24 | \$4.84 | |
| Washington | USWS | \$3.50 | \$5.58 | \$4.01 | \$3.52 | Yes |
| West Virginia | BLAT | \$3.50 | \$6.00 | \$3.99 | \$5.06 | |
| Wisconsin | AMER | \$3.50 | \$4.83 | \$3.86 | \$4.24 | |
| Wyoming | USWS | \$3.50 | \$6.00 | \$4.16 | \$6.53 | |
| Weighted Average | | \$3.50 | \$5.50 | \$4.05 | \$3.71 | Yes |

Analysis of Annual SLC Shortfall

| <u>State</u> | <u>Carrier</u> | <u>Existing SLC Revenues</u> | <u>Low-End NTS Assignment</u> | <u>Shortfall Differences</u> |
|----------------------|----------------|----------------------------------|-----------------------------------|----------------------------------|
| Alabama | BSOU | \$8,001,713 | \$9,050,647 | (\$1,048,934) |
| Arizona | USWS | \$9,249,317 | \$7,805,660 | |
| Arkansas | SWBT | \$3,738,459 | \$5,106,220 | (\$1,367,761) |
| California | PACB | \$75,344,707 | \$58,890,785 | |
| Colorado | USWS | \$9,339,337 | \$8,906,814 | |
| Connecticut | SNET | \$8,084,341 | \$7,045,946 | |
| Delaware | BLAT | \$1,575,906 | \$1,696,996 | (\$121,089) |
| District of Columbia | BLAT | \$4,300,608 | \$2,523,619 | |
| Florida | BSOU | \$37,774,009 | \$33,799,573 | |
| Georgia | BSOU | \$15,735,663 | \$15,933,862 | (\$198,200) |
| Idaho | USWS | \$2,270,719 | \$2,966,121 | (\$695,402) |
| Illinois | AMER | \$25,827,659 | \$25,100,138 | |
| Indiana | AMER | \$12,064,599 | \$10,743,250 | |
| Iowa | USWS | \$4,682,369 | \$5,323,164 | (\$640,795) |
| Kansas | SWBT | \$4,888,518 | \$6,155,162 | (\$1,266,645) |
| Kentucky | BSOU | \$7,775,244 | \$8,862,914 | (\$1,087,670) |
| Louisiana | BSOU | \$8,421,624 | \$9,286,132 | (\$864,508) |
| Maine | NYNX | \$2,416,423 | \$2,980,646 | (\$564,224) |
| Maryland | BLAT | \$13,282,134 | \$11,421,647 | |
| Massachusetts | NYNX | \$16,581,331 | \$10,862,319 | |
| Michigan | AMER | \$21,708,151 | \$22,331,860 | (\$623,708) |
| Minnesota | USWS | \$8,254,583 | \$8,162,164 | |
| Mississippi | SWBT | \$4,546,705 | \$6,494,245 | (\$1,947,541) |
| Missouri | BSOU | \$11,596,579 | \$13,683,628 | (\$2,087,050) |
| Montana | USWS | \$1,303,317 | \$2,116,617 | (\$813,301) |
| Nebraska | USWS | \$3,294,204 | \$3,827,721 | (\$533,517) |
| Nevada | NEVB | \$3,824,398 | \$4,878,095 | (\$1,053,697) |
| New Hampshire | NYNX | \$2,747,959 | \$2,876,387 | (\$128,428) |
| New Jersey | BLAT | \$21,795,532 | \$18,684,859 | |
| New Mexico | USWS | \$3,205,742 | \$3,891,964 | (\$686,222) |
| New York | NYNX | \$46,686,456 | \$35,446,462 | |
| North Carolina | BSOU | \$14,506,754 | \$15,806,491 | (\$1,299,737) |
| North Dakota | USWS | \$1,026,450 | \$1,668,250 | (\$641,801) |
| Ohio | AMER | \$23,515,004 | \$25,168,348 | (\$1,653,344) |
| Oklahoma | SWBT | \$6,211,414 | \$7,093,468 | (\$882,054) |
| Oregon | USWS | \$6,787,263 | \$6,799,449 | (\$12,187) |

Analysis of Annual SLC Shortfall

| <u>State</u> | <u>Carrier</u> | <u>Existing SLC Revenues</u> | <u>Low-End NTS Assignment</u> | <u>Shortfall Differences</u> |
|----------------|----------------|----------------------------------|-----------------------------------|----------------------------------|
| Pennsylvania | BLAT | \$28,229,247 | \$23,309,943 | |
| Rhode Island | NYNX | \$2,353,218 | \$1,837,498 | |
| South Carolina | BSOU | \$5,896,942 | \$6,523,834 | (\$626,892) |
| South Dakota | USWS | \$1,154,392 | \$1,960,525 | (\$806,132) |
| Tennessee | BSOU | \$10,672,465 | \$12,039,228 | (\$1,366,763) |
| Texas | SWBT | \$40,677,490 | \$40,038,659 | |
| Utah | USWS | \$3,817,586 | \$3,705,929 | |
| Vermont | NYNX | \$1,227,761 | \$1,601,554 | (\$373,794) |
| Virginia | BLAT | \$16,144,145 | \$14,505,642 | |
| Washington | USWS | \$11,699,831 | \$10,551,831 | |
| West Virginia | BLAT | \$2,919,413 | \$3,721,099 | (\$801,687) |
| Wisconsin | AMER | \$9,309,654 | \$10,275,218 | (\$965,564) |
| Wyoming | USWS | \$906,287 | \$1,427,226 | (\$520,940) |
| | | \$587,373,614 | \$6,658,677,681 | (\$308,155,011) |